

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

**IN RE: BLONDELL P. TUTWILER**

**NO. 18-12412-NPO**

**OBJECTION TO MOTION TO AVOID JUDICIAL LIEN**

Annie Border-Blackwell, as Executrix of the Estate of Julia Tutwiler Borders, Deceased (“Movant”) objects to the Debtor’s motion to avoid judicial lien (Doc 28) and for cause would show as follows:

1. Movant possesses a valid unavoidable judgment lien on all of the real and personal property assets of the Debtor. No sums have been paid on the Judgment.
2. The lien of the Movant attaches to all non-exempt property of the Debtor. Movant has objected to the Debtor’s claimed exemptions and the alleged value of each.
3. Until the exemption issue is resolved, the Debtor’s motion is premature and must be denied.

WHEREFORE, PREMISES CONSIDERED, Annie Border-Blackwell, as Executrix of the Estate of Julia Tutwiler Borders, Deceased requests that this Court deny the Debtor’s motion to avoid judicial lien and grant such other relief as is necessary under the circumstances.

DATED: October 9, 2018

**ANNIE BORDER-BLACKWELL, AS  
EXECUTRIX OF THE ESTATE OF JULIA  
TUTWILER BORDERS, DECEASED**

By: /s/ Jeff Rawlings  
Her Attorney

**CERTIFICATE OF SERVICE**

I served a copy of the foregoing on October 9, 2018 via the ECF notification service to Gwendolyn Baptist-Rucker, thebaptistlawfirm18@gmail.com, Jeffrey A. Livingston, jleving@bellsouth.net and the Office of the U. S. Trustee, USTPRegion05.AB.ECF@usdoj.gov.

/s/ Jeff Rawlings  
Jeff D. Rawlings

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